

1 QUINN EMANUEL URQUHART & SULLIVAN LLP
2 Kevin P.B. Johnson (Bar No. 177129)
kevinjohnson@quinnemanuel.com
3 Brett Arnold (Bar No. 266740)
brettarnold@quinnemanuel.com
4 Margaret Shyr (Bar No. 300253)
margaretshyr@quinnemanuel.com
5 555 Twin Dolphin Drive, 5th Floor
Redwood Shores, California 94065-2139
Telephone: (650) 801-5000
6 Facsimile: (650) 801-5100

7 Joseph Milowic III (*admitted pro hac vice*)
josephmilowic@quinnemanuel.com
8 51 Madison Ave., 22nd Floor
New York, NY 10010
9 Telephone: (212) 849-7000
Facsimile: (212) 849-7100

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11 Attorneys for Juicero Inc.

12 UNITED STATES DISTRICT COURT

13 NORTHERN DISTRICT OF CALIFORNIA

14 JUICERO INC., a Delaware corporation,

CASE NO. 5:17-cv-01921-BLF

15 Plaintiff,

DECLARATION OF PAUL KATZ

16 vs.

17 iTASTE CO., LTD., a/k/a iTaste Co., Ltd.
Shanghai, China and Shanghai iTaste
18 Electronics Technology Co., Ltd., d/b/a Juisir;
FROOTHIE USA LLC, a Delaware limited
liability company; and
19 XIUXING “LEO” CHEN, an individual,

20 Defendants.

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1 I Paul Katz, declare as follows:

2 1. I am currently employed by Juicero, Inc. ("Juicero") and serve as its Vice President
3 of Engineering, which I have done since 2013. I am responsible for overseeing engineering team
4 members and am familiar with Juicero's intellectual property. Unless otherwise stated, I have
5 personal knowledge of the facts stated in this declaration, and I could and would competently
6 testify thereto if called as a witness.

7 2. I collaborated with Doug Evans to invent the juicing systems and methods
8 described in U.S. Patent No. 9,493,298 ("the '298 patent"). Doug first began working on the
9 project that would culminate in the Juicero Press in 2013. Based on his initial work and our
10 further collaboration, we started testing functioning prototypes in the summer of 2014. We
11 developed twelve prototypes before arriving at what is now the Juicero Press. Juicero began
12 testing Juicero Press prototypes with consumers in the fall of 2015.

13 3. The Juicero Press uses cold-press technology to deliver thousands of pounds of
14 force to extract high-nutrient juice from fresh produce provided in the Juicero Pack without
15 generating unwanted heat or mess, with no cleanup of the juice machine required. In addition to
16 its functionality, the Juicero Press was designed to have a sleek, minimalist, and iconic look.



27 4. Unlike the Juicero Press, most other juicers on the market are either centrifugal or
28 masticating juicers. Centrifugal juicers work by grating produce into small pieces and then rapidly

1 spinning the juice out. Masticating juicers use one or more spinning augers to crush juice out of
2 pulp. Both methods involve contact between the machine's moving parts and the produce inside,
3 creating a mess that has to be cleaned after each use, usually through disassembling the product.

4 5. The Juicero Press uses neither method. Instead, the Juicero Press accepts pouches
5 filled with fresh produce that are pressed inside the machine to extract nutrient-rich juice. There
6 are no blades, grinders, spigots, or other machine parts that require disassembly or cleaning after
7 each use. In fact, due to the unique design of the Juicero Press, which utilizes produce-filled
8 packs, neither the produce or juice ever comes in contact with the device, eliminating the clean-up
9 steps required by other juicers.

10 6. The Juicero Press embodies Claim 3 of the '298 patent. It includes: (1) a region
11 that receives juicer cartridges, with the cartridges having both an outlet and food matter inside; (2)
12 a pressing element that applies pressure to the juicer cartridge to extract fluid from it without the
13 fluid or food matter touching the machine; and (3) a dispensing point below the pressing region
14 that allows the cartridge to extend beyond the pressing region and dispense the fluid. Without the
15 third feature, the juice would be trapped in the cartridge or it would be forced out of the cartridge
16 into the pressing region causing juice and food to come into contact with the machine.

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18 [SIGNATURE ON FOLLOWING PAGE]

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I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 9, 2017 at San Francisco, CA.

By


Paul Katz

-1- Case No. 5:17-cv-01921-BLF
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